Remarks/Arguments

Introduction

Applicant has carefully reviewed the Office Action mailed on May 11, 2009. Claim 8 has been amended for clarity purposes. The Applicant notes with appreciation the allowance of claims 5, 6, 13 and 14. Claims 7 and 9 remain canceled without prejudice. Claims 1-6, 8 and 10-16 remain pending in this application. Applicant requests reconsideration of the above-identified application in view of the following remarks.

Claim Rejections

Claim 1 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Japanese Patent Application No. JP-63-73754 (hereinafter 'Kato') in view of Admitted Prior Art (hereinafter 'APA').

Claim 1 of the present application recites, inter alia:

> a first reference input;
> a second reference input;
> a reference select circuit coupled to said first and second reference inputs; and
> at least one router component coupled to said reference select circuit;
> wherein said reference select circuit: (1) passes a first signal applied to said first reference input to said at least one router component as a first reference signal and a second signal applied to said second reference input to said at least one router component as a second reference signal in response to determining that said first and second signals are error-free; (2) passes said first signal to said at least one router component as said first reference signal and as said second reference signal in response to determining that said first signal is error-free and said second signal is not error-free; and (3) passes said second signal to said at least one router component as said first reference signal and as said second reference signal in response to determining that said first signal is not error-free and said second signal *is error-free.

Accordingly, claim 1 includes a reference select circuit configured to pass two different reference signals applied to different, respective reference signal inputs (see,

e.g., Specification, p. 9, lines 1-4; FIG. 2, elements 144, 146, 148). The Kato reference, taken singly or in view of APA, does not disclose or render obvious at least this feature of claim 1.

First, the selector circuits of Kato do not receive different reference signals from two different reference signal inputs. Rather, the selector circuits 13-0, 13-1 receive clock signals generated from a common, single reference signal input (Kato, p. 3, Industrial Application Field, paragraph 2, lines 1-3; p. 4, Means to solve the problems, paragraph 1, lines 2-4, p. 5, Application examples, paragraph 3, lines 1-3). Nowhere does Kato disclose or suggest using two different reference signals from different reference signal inputs. Rather, Kato teaches that a single reference signal should be used to improve reliability (see, e.g., Kato, p. 3, Industrial Application Field, paragraph 2, lines 1-3 & lines 7-8). Furthermore, APA does not cure the deficiencies of Kato. Regardless of whether multiple reference signal inputs exist in the art, that knowledge would not affect the internal processing of Kato, **which is entirely based on generating multiple, redundant clock signals from a single reference signal input**.

Secondly, Kato does not disclose any selector circuit that passes both a first reference signal and a second reference signal, as recited in clause (1) of claim 1. Each selector 13-0, 13-1 of Kato passes only one of the two clock signals it receives; the selectors at no time pass both received clock signals (see, e.g., Kato, FIGS. 1-2; application examples, p. 5-6, paragraphs 3 and 6). Despite the assertions posed in the Office Action, selectors 13-0 and 13-1 cannot be considered a single selector circuit. Selectors 13-0 and 13-1 comprise part of two entirely different synchronizer systems 11-0 and 11-1, with identical, redundant components (see, e.g., Kato, FIG. 2) (see also p. 4, Means to solve the problems, paragraph 1; p. 4-5, Operation). Furthermore, Kato anticipates that if one its selectors should fail, the other selector can function in its place (see, e.g. Kato, p. 4-5, Operation, lines 1-5). Accordingly, Kato treats its selectors as completely different selector circuits.

In addition, even in light of the Specification, one of ordinary skill in the art would consider selectors 13-0 and 13-1 as separate selector circuits. For example, the Specification describes two redundant components 102A and 102B, each of which has a

separate "reference select circuit" 144 (see, e.g., FIGS. 1-2; p. 4, lines 8-10; p. 4, lines 14-18). Kato describes two redundant components 11-0 and 11-1, each of which has a clock signal selector 13-0, 13-1 (see, e.g., FIG. 2). Thus, comparing FIGS. 1-2 of the Specification with FIG. 2 of Kato, one of ordinary skill in the art would not consider both of selectors 13-0 and 13-1 as comprising a single "reference select circuit," as recited in claim 1. As such, Kato does not disclose or render obvious a selector circuit that passes both a first reference signal and a second reference signal.

Therefore, Applicant maintains that claim 1 patentably distinguishes over Kato and/or APA for at least the reasons discussed above. Withdrawal of the rejection is respectfully requested.

Claim 2 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kato in view of APA in further view of U.S. Patent No. 6,104,997 to Shuholm (hereinafter 'Shuholm').

Claim 2 depends from claim 1. As such, claim 2 incorporates by reference a reference select circuit configured to pass two different reference signals applied to different, respective reference signal inputs. As discussed above, Kato and/or APA do not disclose or render obvious at least this feature of claim 1. Similarly, Shuholm fails to cure the deficiencies of Kato. At best, Shuholm discloses selectors that select different audio data from FIFO registers (see, e.g., Shuholm, column 2, lines 38-42). Nowhere does Shuholm teach or suggest passing two different **reference** signals. Accordingly, applicant maintains that claim 2 patentably distinguishes over the cited references. Withdrawal of the rejection is respectfully requested.

Claims 3 and 4 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kato in view of APA in further view of U.S. Patent No. 6,680,939 to Lydon et al. (hereinafter 'Lydon').

Claims 3 and 4 depend from claim 1. As such, claims 3 and 4 incorporate by reference a reference select circuit that is configured to pass two different reference signals applied to different, respective reference signal inputs. As discussed above, neither Kato nor or APA disclose or suggest this feature of claim 1. Similarly, Lydon fails to cure the deficiencies of Kato. Lydon discloses an expandable router adapted to

route several different data streams from its input terminals to its output terminals (see Lydon, Abstract). Nowhere does Lydon disclose manipulating reference signals in any way. Accordingly, claims 3 and 4 patentably distinguish over the cited references. Withdrawal of the rejection is respectfully requested.

Claims 8, 10 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Shuholm in view of Kato in further view of U.S. Patent Publication No. 2002/0031148 (hereinafter 'Watanabe').

Claim 8 includes similar, relevant features discussed above with regard to claim 1. Claim 8 recites, inter alia:

> providing a broadcast router having first and second reference inputs . . .
> wherein said broadcast router includes a reference select circuit to which said first and second reference inputs are fed, said reference select circuit configured to (1) pass signals applied to said first reference input to reference signal-demanding components of said broadcast router as a first reference input signal and signals applied to said second reference input to said reference signal-demanding components of said broadcast router as a second reference input signal in response to determining that said signals applied to said first and second reference inputs are error-free; (2) pass signals applied to said first reference input to said reference signal-demanding components of said broadcast router as said first reference input signal and as said second reference input signal in response to determining that signals applied to said first reference input are error-free but signals applied to said second reference input are not error-free; and (3) pass signals applied to said second reference input to said reference signal-demanding components of said broadcast router as said first reference input signal and as said second reference input signal in response to determining that signals applied to said first reference input are not error-free but signals applied to said second reference input are error free.

Accordingly, claim 8 includes a reference select circuit configured to pass both a signal applied to a first reference input and a signal applied to a second reference input. As discussed above, Kato and/or APA do not disclose or suggest this feature. Moreover, Watanabe does not cure the deficiencies of Kato. Similar to Kato, the selector of Watanabe passes only one of the two signals it receives; the selector at no time passes both received signals (see, e.g., Watanabe, FIG. 1, 'SEL'). Thus, claim 8 patentably distinguishes over Kato, APA and Watanabe, taken singly or in any combination, at least because the references do not disclose or render obvious a reference select circuit that

passes both signals applied to a first reference input and signals applied to a second reference input, as recited in clause (1) of claim 8. Withdrawal of the rejection is respectfully requested.

Claim 11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kato in view of APA in further view of Watanabe.

Claim 11 depends from claim 1. As such, claim 11 incorporates by reference select circuit that is configured to pass two different reference signals applied to different, respective reference signal inputs. As discussed above, Kato, APA and/or Watanabe do not disclose or render obvious at least this feature. Accordingly, claim 11 patentably distinguishes over the cited references. Withdrawal of the rejection is respectfully requested.

Claim 12 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kato in view of APA in further view of "Is Your Plant Infrastructure Up To Handling Multichannel Digital Audio?" (hereinafter 'Bytheway'). In addition, Claim 16 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Shuholm in view of Kato, in further view of Watanabe and in further view of Bytheway.

Claims 12 and 16 depend from claims 1 and 8, respectfully. As such, claim 12 and 16 incorporate by reference select circuit that is configured to pass two different reference signals applied to different, respective reference signal inputs. As discussed above, Kato, APA, Shuholm and Watanabe do not disclose or suggest this feature. Similarly, Bytheway fails to cure the deficiencies the references. While Bytheway generally describes synchronizing input signals to a common reference signal, Bytheway does not disclose the use of a reference select circuit in any way. Accordingly, claims 12 and 16 patentably distinguish over the art of record for at least the reasons discussed above. Withdrawal of the rejections is respectfully requested.

Conclusion

In view of the foregoing, Applicant solicits entry of this amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should

contact the applicant's attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

No fees are believed due with regard to this Amendment. Please charge any fee or credit any overpayment to Deposit Account No. **07-0832.**

Respectfully submitted,
Carl Christensen

By: /Robert B. Levy/
Robert B. Levy
Attorney for Applicant
Reg. No. 28,234
Phone (609) 734-6820

Patent Operations
Thomson Licensing LLC
P.O. Box 5312
Princeton, New Jersey 08543-5312
July 31, 2009